



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 6, 2011

Christopher Savage, District Ranger
Petersburg Ranger District
PO Box 1328
Petersburg, Alaska 99833

Re: EPA comments on the Central Kupreanof Timber Harvest Final Environmental Impact Statement, EPA Project # 06-083-AFS.

Dear Mr. Savage:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the proposed Central Kupreanof Timber Harvest project in the Petersburg Ranger District, Tongass National Forest, Alaska (CEQ #20110068). The National Environmental Policy Act (NEPA) and Clean Air Act §309 require EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

In our February 2009, comments on the draft EIS, EPA expressed environmental concerns related to the potential impacts to essential fish habitat and water quality from proposed harvest activities. We recommended that the Forest Service minimize or avoid construction of new roads; consider alternate extraction methods and minimize ground-based extraction where feasible; consider methods other than even-aged treatment (clearcut), particularly in the Scenic Viewshed LUD and in sensitive watersheds; develop monitoring plans, including in-stream measures of water quality; protect biological diversity, especially that of critical habitat or unique vegetation; and prohibit activities in areas where high hazard/high mass movement index soils are present, or in watersheds identified as most sensitive.

The final EIS and Record of Decision indicate that the Forest Service has selected a modified version of Alternative 3, which will make approximately 26.3 million board feet of timber available for harvest from 1,329 acres of commercial forest land. This alternative eliminates harvest at the headwaters of the Castle River Watershed and increases efficiency by including all harvest units along the road system and closest to Kake. While eliminating the need for expensive aerial logging, the selected alternative also reduces the need for the construction and maintenance of new roads. Finally, the modified alternative changes the management prescription from even aged to clearcut with reserves or a two aged prescription on 532 acres. This will minimize visual impacts as well as impacts to wildlife habitat by retaining stand structure and maintaining connectivity.

Overall this modified alternative addresses most of the environmental concerns we identified in the draft EIS. We appreciate the additional time and effort put forth by the Forest Service to develop a final alternative that balanced the concerns of the local community and the

economics of the proposal, while reducing the potential environmental impacts of the project. We encourage diligent implementation of the monitoring program identified in the EIS to ensure anticipated outcomes and goals are achieved.

We appreciate the effort taken by the Forest Service to address our concerns, and we continue to support economic harvest activities that minimize impacts to resources. If you have questions or you would like to discuss the above comments, please contact me at (206) 553-1601, or contact Jennifer Curtis of my staff at (907) 271-6324, or by email at curtis.jennifer@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit